

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of TexasUnited States Courts
Southern District of Texas

FILED

March 30, 2023

United States of America
v.
UNITED STATES OF AMERICA
v.
Antonio Dario Osorio-Avelar a.k.a.
Antonio Osorio a.k.a.
Pressure

Defendant(s)

Case No. **4:23-mj-619**

Nathan Ochsner, Clerk of Court

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Jan. 6, 2023 and Jan. 26, 2023 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section
18 U.S.C. § 1591

Offense Description
Sex Trafficking of a Minor

This criminal complaint is based on these facts:
See Attached Affidavit of Special Agent David J. Pawson

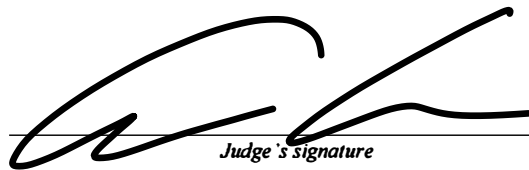
☒ Continued on the attached sheet.

Complainant's signature

David Pawson, Special Agent

Printed name and title

Sworn to before me and signed telephonically.

Date: March 30, 2023City and state: Houston, Texas

Judge's signature

Andrew M. Edison, U.S. Magistrate

Printed name and title

4:23-mj-619

**AFFIDAVIT IN SUPPORT OF AN
APPLICATION FOR CRIMINAL COMPLAINT**

I, David Pawson, being first duly sworn, hereby state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of applications for the following:
2. A criminal complaint charging Antonio Dario Osorio-Avelar (Osorio) also known as “Pressure” with sex trafficking of a minor, in violation of 18 U.S.C. § 1591; I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI) and have been since 2009. My experience as a Special Agent has included, among other things, the investigation of cases involving cybercrime, child exploitation, child pornography and human trafficking. I have received specialized training in the investigation of child exploitation offenses and human trafficking. I have also received training and have gained experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, and various other criminal laws and procedures. I have not included every detail of every aspect of my training, education, and experience but have highlighted those areas most relevant to this application.
3. Because this affidavit is submitted for the limited purpose of securing authorization for the requested complaint, I have set forth only the facts that I believe are necessary to establish the necessary foundation for a determination of probable cause. Based on my training, experience, conversations of other law enforcement investigators, and the facts as set forth in this affidavit, I submit that probable cause exists to believe that Osorio knowingly caused a minor to engage in commercial sex for which he benefitted financially in violation of

18 U.S.C. § 1591. I further submit that probable cause exists to believe that Osorio knowingly caused this minor female to engage in commercial sex by force and coercion in violation of 18 U.S.C. § 1591.

BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE

4. On January 26, 2023, myself and other HSI Special Agents participated in an operation intended to locate Minor Victim 1, a 16-year-old female, who was previously reported as being sex trafficked in the area of Bissonnet Street, Houston, Texas. I am aware that the Bissonnet Street area, where it intersects with Plainfield Street in Houston, Texas, is known to law enforcement as the “Blade” is an area heavily utilized for the commercial sex trade. Adults and minors are regularly caused to engage in commercial sex by sex traffickers in this area.

5. On January 26, 2023, at approximately 9:00 pm, while conducting surveillance near the intersection of Bissonnet Street and Plainfield Street, Minor Victim 1 was observed by Special Agent Jason Stewart walking across the parking lot of the Burger King restaurant located at 9603 Bissonnet Street. Minor Victim 1 was accompanied by Alejandra Banegas-Calderon (Banegas), an 18-year-old female, believed to be a co-conspirator of Osorio in this human trafficking operation.

6. During a brief interview of Minor Victim 1 at the Burger King, she admitted that she is currently engaged in commercial sex and further identified Antonio Osorio a.k.a. “Pressure” as the Pimp that caused her to do so in Houston, Texas. Minor Victim 1 explained that she met Osorio on or about January 6, 2023, in Dallas, Texas at or near Harry Hines Blvd through “Bambii,” another female who was engaging in commercial sex under Osorio’s direction. Bambii suggested Minor Victim 1 “choose up” with her pimp. When Bambii

suggested this to Minor Victim 1, Minor Victim 1 had already been engaging in commercial sex for another “pimp” on Harry Hines Blvd.

7. I know from my training and experience investigating sex trafficking, the term “choose up” is used when a person seeking to engage or already engaging in commercial sex is recruited to work under a particular pimp. This process often requires a “choosing fee” to be paid by the prostitute to the new pimp. This is a process conducted in order to increase earning potential and generate loyalty to the pimp.

8. Minor Victim 1 admitted she lied to Osorio about her age when she first met him indicating she was 17 years old when in fact she was only 16 years old at that time. After having a conversation with Osorio, Minor Victim 1 agreed to engage in commercial sex for him. Minor Victim 1 engaged in commercial sex on his behalf for only one night on Harry Hines Blvd. along with two other females previously working for Osorio. Each of them completed three commercial sex dates the first night together in Dallas, Texas. They then turned over all the money they earned from the commercial sex acts to Osorio. Minor Victim 1 was then driven from Dallas, Texas to Houston, Texas by Osorio the following day with Bambii and another minor female using the name “Anjaly”.

9. To facilitate her commercial sex activity and to exercise control over Minor Victim 1, Osorio provided Minor Victim 1 with an Apple iPhone. He also used the phone to coordinate her commercial sex activities including determining the price per sex act and determining whom she may or may not service. Osorio provided Minor Victim 1 instructions via text message on that device such as when to engage in commercial sex, where she should be

in order to attract “clienteles,” and have her check in with him upon arrival at the Pearl Inn or other locations used to engage in commercial sex. She was further instructed that when the sex act is concluded, she was to inform Osorio how much money was being paid and how she would return to the Blade. Osorio also utilizing this device to track Minor Victim 1’s location with the device’s location services.

10. Osorio gave Minor Victim 1 a “quota” of \$500.00 per night. He also provided condoms for her use during intercourse. In addition to the phone, Osorio provided Minor Victim 1 with condoms and even purchased clothing for her to wear while engaging in commercial sex.

11. I am aware the term “quota” generally refers to a set amount of money that a trafficking victim must make each night before she can come “home.” Quotas are often set between \$300 and \$2000 in the commercial sex trade. Minor Victim 1 told Special Agent Stewart that much of this communication was conducted through Instagram. Instagram, a social media platform that resides on the internet, is a facility of foreign and interstate commerce.

12. On the second day Minor Victim 1 was working under Osorio, he drove Minor Victim 1, Anjaly, and Bambii to Houston, Texas in order to continue engaging in commercial sex. Minor Victim 1, Bambii, and Anjaly engaged in commercial sex in the Bissonnet Street area of Houston, Texas where they advertised themselves for commercial sex by walking along the Blade.

13. On January 9, 2023, Osorio provided Minor Victim 1 with an email and password necessary to log into his account on the commercial sex website “Megapersonals.eu” and instructed her to post commercial sex advertisements for herself and Anjaly. Minor Victim

1 told Special Agent Stewart that Osorio sent his username and password for his account to her via text message (bribaby2002@icloud.com / FuckYouBitch\$\$\$). I know from my experience that Megapersonals.eu is classified as a dating app however it is often used to advertise commercial sex and, in this case, covertly advertise child sexual abuse material.

14. A search of computer indices of telephone number 832-946-4922 which was assigned to the telephone used by Minor Victim 1 for commercial sex revealed advertisements on Megapersonals.com. Minor Victim 1 is depicted on each of these advertisements dressed in lingerie and posing in a sexually provocative manner. On two of these advertisements, Minor Victim 1 can be observed performing oral sex upon adult males. I recognize one of these images of her performing oral sex as a screenshot from a recorded video containing child sexual abuse material produced by Osorio. This video was sent to Minor Victim 1 by Osorio to complete a sale of “content”.

15. The “screenname” of the girl depicted on these Megapersonals.com advertisements is Crystal. Minor Victim 1 stated that she used the name Crystal while engaging in commercial sex at Osorio’s behest. Other photographs obtained from forensic examinations in this investigation of Minor Victim 1’s telephone as well as Banegas’ telephone were extracted and presented to Minor Victim 2, a 16-year-old female. Minor Victim 2 also identified images of Minor Victim 1 as Crystal. Additionally, Banegas told Special Agent Jason Stewart, during a post Miranda interview, that she also knows Minor Victim 1 as Crystal.

16. On January 25, 2023, Special Agent Stewart received records from Megapersonals.com pertaining to https://megapersonals.eu/public/post_detail/43828984 and

https://megapersonals.eu/public/post_detail/43867066 showing phone number 832-946-4922, URLs on which Minor Victim 1 was discovered to be depicted wearing sexually provocative attire and advertised for commercial sex in Houston, Texas. The records provided list the email login for the account for these advertisements to be bribaby2002@icloud.com. The record lists telephone number 832-946-4922 as the contact number on the advertisement. The record indicates this advertisement was published on January 17, 2023, from IP address 166.205.101.39. Megapersonals.com further indicates this advertisement was posted from an iPhone using iOS 15.4.

17. Additional advertisements depicting Minor Victim 1, containing the same account information such as telephone number, email login, images, location, advertisement language, name, and iPhone description were also provided and further indicate they were posted from IP address 98.194.100.86. Records received from Comcast show the subscriber associated to this IP address is Elvia Garcia at 11717 Beamer Road, apartment 171 in Houston, Texas. Garcia is the mother of Osorio. Osorio also list this address on his Texas Driver's License.

18. Additional records provided by Megapersonals.com on similar advertisements depicting Minor Victim 1 for commercial sex were posted containing same email login, images, location, similar advertisement language, name, iPhone description and the telephone number, 832-946-4922. These advertisements were posted from IP address 50.246.35.121 on January 10, 2023. Records received from Comcast show the subscriber associated to this IP address is the Super 8 Motel located at 10130 Almeda Genoa Road in Houston, Texas.

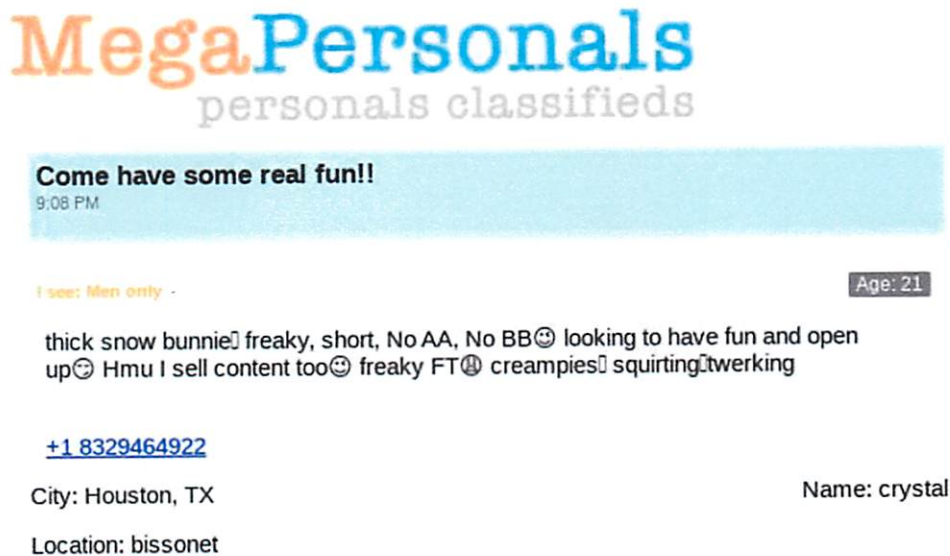
19. On February 14, 2023, Special Agent Mitch Lundquist received records from the Super 8 Motel located at 10130 Alameda Genoa Road in Houston, Texas indicating room 214 was registered to Dario Osorio for the period January 9, 2023, through January 15, 2023. As a part of the registration process, the motel collects scans of the registrant's identification. In this case the Texas Driver's License of Antonio Dario Osorio-Avelar with a date of birth 2/28/2003 was used. The registrant further provided his telephone number; 832-866-6988.

20. On January 27, 2023, Minor Victim 1 consented to a forensic examination of her cellular telephone, an Apple iPhone SE, which was conducted by HSI Computer Forensics Analyst (CFAs) in Houston, Texas. A review of the cellphone extraction provided the Apple ID associated with this Apple iPhone SE which was listed as pressureantonio@icloud.com. This review revealed a contact list which included a telephone number for "Pressure," a moniker used by Osorio. Multiple text communications between telephone number 832-866-6988 and Minor Victim 1's telephone are present on Minor Victim 1's device which are indicative of sex trafficking of a minor. Other communications between the two numbers also confirm the Megapersonals.com login information was sent to Minor Victim 1.

21. In one conversation from January 11, 2023, Minor Victim 1 asked Pressure, "do you have cash app?" to which Pressure responded, "yea." Minor Victim 1 then goes on to state, "trick has cash app," to which Pressure responds with a screen shot of a Cash App account with a display name of Antonio Osorio, and an account name of \$PressureAo. Later in the conversation, Minor Victim 1 sent "Pressure" a message stating, "send me the videos so I can get this 100 (referring to \$100 USD)." "Pressure" responds by sending two videos, one showing

Minor Victim 1 performing oral sex on Osorio and the second video of Minor Victim 1 and Osorio engaging in sexual intercourse.

22. In addition to advertising herself for commercial sex by walking on the Blade, Minor Victim 1 was also advertised on Megapersonals.eu for “content”. I am aware that both adult and minors are advertised on Megapersonals.eu for commercial sex as well as for content which is usually previously recorded material depicting sex and sexually explicit videos for sale. In this situation, two videos produced by Osorio of him having sexual intercourse and other sexual acts with Minor Victim 1.



23. Other conversations between Minor Victim 1 and Osorio were discovered on her device where she asked Osorio if they are working certain nights because she needs to get ready or where she asked Osorio if she is allowed to take a nap before going out to the “blade.” In

other conversations Minor Victim 1 messages Osorio about “dates” that she has “caught” and provides locations, or if they are on car dates or hotel dates.

24. Between January 7, 2023, through January 26, 2023, Minor Victim 1 messages Osorio at least twenty-one times informing him that she has some sort of date. For example, on January 8, 2023, Minor Victim 1 messages Osorio, “1: car date,” and then states, “he’s car too little he said he wants to get a room, wha do I do?” Osorio then responds, “ight go to pearl inn, followed by the address.” (Agents Note: The Pearl Inn is a hotel located at 11959 S Sam Houston Parkway W Houston, TX. This hotel is known by law enforcement as a known place for commercial sex activity).

25. Based on my training and experience, victims who are being forced or coerced into prostitution rarely control basic aspects of their own life. I believe Minor Victim 1 was being “controlled” by Osorio so she was not able to make basic decisions such as if she can take a nap or not or whether or not she will be going to “work”. Additional examples of these are found in other conversations between Minor Victim 1 and Osorio where she asked him to provide tampons, condoms, new outfits as well as what outfits she is allowed to wear while on the Blade.

26. On January 19, 2023, Minor Victim 1 and the following text conversation with Osorio during which Minor Victim 1 speaks to her age and Osorio acknowledges that she is a minor involved in the commercial sex trade:

To: +18328666988 pressure: females going areound sayin im a minor

To: +18329464922: why ?

To: +18328666988 pressure: i dont freaking kno

To: +18329464922: fuckk dem

To: +18328666988 pressure: nahhhhh bcs they just told my trick

To: +18328666988 pressure: i said i was 19

To: +18329464922: so wat he dont want the date ?

To: +18328666988 pressure: he do

To: +18329464922: ok

To: +18328666988 pressure: done

To: +18329464922: ight

To: +18329464922: come out

27. On January 20, 2023, Minor Victim 1 contacts Osorio via text message and begins by asking if she could get some food. Osorio indicates he is talking to tattoo artists. Minor Victim 1 had asked if she could get a tattoo, an activity that requires a person to be 18 years old or have parental consent. Osorio again indicates knowledge of Minor Victim 1's age by telling her to say she is 18.

To: +18328666988 pressure: also can we go get sum food?

To: +18329464922: yea holl on im trynna see if da tattoo men up

To: +18328666988 pressure: alr sounds good.

To: +18328666988 pressure: how old i say i am

To: +18328666988 pressure: iff they ask

To: +18329464922: 18

CONCLUSION

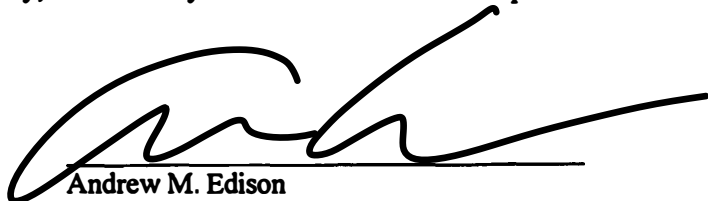
Based on the foregoing, I submit that probable cause exists to believe between January 6, 2023, and January 26, 2023, Antonio Dario Osorio-Avelar, having knowledge of Minor Victim 1's age, caused her to engage in commercial sex in the Southern District of Texas with the use of Cellular Telephones manufactured in China, the internet to advertise commercial sex and online Peer to Peer money transfer application affecting interstate commerce. I therefore request that the Court issue a criminal complaint and arrest warrant charging him with violating Title 18 USC § 1591.

Dated at Houston, Texas this 29th day of March 2023.



David Pawson, Special Agent
Homeland Security Investigations

Sworn and subscribed telephonically, this 30th day of March 2023 and I find probable cause.



Andrew M. Edison
UNITED STATES MAGISTRATE JUDGE